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January 28, 1985

Woodland Hills

REPLY TO:

HAND DELIVERED

Robert Kropp, Esq.
TAYLOR, ROTH & BUSH
Suite 1100
617 South Olive Street
Los Angeles, CA 90014

Re: Deposition of Gerald Armstrong
Wollersheim v. Church of Scientology
of California

Dear Mr. Kropp:

As I advised you during our telephone conversation this morning, my client, Gerald Armstrong, was served with a subpoena re deposition by your client on Thursday, January 24, 1985, for a deposition to take place on Tuesday, January 29, 1985. When Mr. Armstrong left a message with me on Friday, January 25, indicating that he had been served, this was the first time I had been notified of any deposition. Thus, Mr. Armstrong and I had approximately two days' notice of the deposition. I have been representing Mr. Armstrong for three and one-half years; you and your firm are well aware of that fact. Yet, I received no advance notice.

This morning, I telephoned you to advise you that I learned Mr. Armstrong had been served, that the notice was extremely short, and that I had an arbitration scheduled for the deposition date. You advised that you could not continue the deposition beyond Thursday, January 31, 1985, because you had certain papers to file with the Court which required his testimony. I told you that I would call you back once I had spoken to Mr. Armstrong.

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On further consideration of this matter, I have decided that you have not provided the "reasonable" notice required by Section 1987 of the Code of Civil Procedure, and that I would be required to change my entire schedule for this week to accommodate you and your client. I am not willing to do that.

Your client has deposed Mr. Armstrong in his own case (Church of Scientology of California v. Gerald Armstrong, C 420 153) on five separate occasions: August 17, 1982; August 18, 1982; January 14, 1983; September 19, 1983; and October 28, 1983. Attorneys for your client cross-examined Mr. Armstrong for four days during trial in the Armstrong case (May 17, 19, 21 and 22, 1984), and have access to five days of his direct testimony (May 10, 11, 14, 15 and 16, 1984). Your client has deposed Mr. Armstrong in other cases as well. Only so much information can be obtained from one individual on the topics of L. Ron Hubbard and Scientology. I believe your client has obtained that information on a number of occasions. I have reviewed a declaration of Gerald Armstrong signed November 16, 1984, and am advised that this declaration was filed in the Wollersheim case. I understand that a second declaration was also filed about the same time. The information contained in these declarations has been the subject of other depositions taken by your client of Mr. Armstrong.

Although you advised me that it would take a great deal of time to look through these depositions and find the testimony you are looking for, I believe that such time would be well spent. Your client cannot continue to repeatedly depose Mr. Armstrong on the same issues. Further, I note that the declarations of my client were filed in October and November of 1984. If you required his testimony before filing your papers, why did you wait until four days before your papers were due to notice his deposition. You have known of his written testimony for approximately four months.

Without proper notice, I did not even have enough time to seek a protective order. Thus, should you desire to depose Mr. Armstrong in the future, I wish to have notice well in advance since I intend to file a motion for protective order.

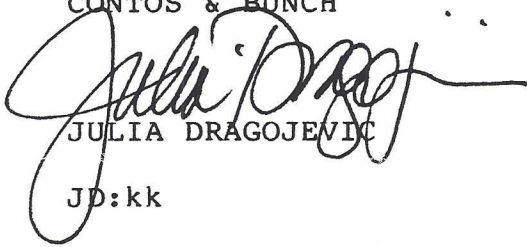
Lastly, during the Armstrong trial, Judge Breckenridge took judicial notice that Mr. Armstrong is an expert witness on the subjects of L. Ron Hubbard and Scientology. I suggest

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that you be prepared to pay expert witness fees to him if and when you depose him again.

Very truly yours,

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A handwritten signature in dark ink, appearing to read "Julia Dragojevic", is written over the typed name. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

JULIA DRAGOJEVIC

JD:kk

JD17:4

cc: Gerald Armstrong